

EXHIBIT B



January 27, 2025

G. Edgar James
(816) 623-0544 Direct
(816) 853-0403 Mobile
ejames@jamessobba.com

VIA CERTIFIED MAIL and EMAIL

N. Scott Rosenblum, Esquire
Rosenblum Schwartz & Fry, P.C.
120 South Central Avenue, Suite 130
Clayton, Missouri 63105
E: srosenblum@rsflawfirm.com,
afein@rsflawfirm.com,
hcollins@rsflawfirm.com

VIA CERTIFIED MAIL and EMAIL

Thomas J. Ali, Esquire
The Law Offices of Thomas J. Ali, P.A.
3399 PGA Boulevard, Suite 150
Palm Beach Gardens, Florida 33410
E: skaplan@stuartkaplanpa.com,
rbailey@stuartkaplanpa.com

VIA CERTIFIED MAIL and EMAIL

Stuart N. Kaplan, Esquire
The Law Offices of Stuart N. Kaplan, P.A.
3399 PGA Boulevard, Suite 150
Palm Beach Gardens, Florida 33410
E: tali@stuartkaplanpa.com

**Re: *DRE Health Corporation v. Berkley Equity Limited and Anthony Lyons;*
Case No.: 4:22-cv-00031-RK; United States District Court Western
District of Missouri; Notice of Attorneys' Lien**

Counsel:

We write to you in your capacity as counsel for Berkley Equity Limited and Anthony Lyons (collectively “Berkley”). Consider this letter as notice of lien pursuant to RSMo. § 484.130 and RSMo. § 484.140.

January 27, 2025

Page 2

You are hereby notified that the undersigned attorneys-at-law have a contract with DRE Health Corporation (“DRE”) for legal services rendered and to be rendered by them in and about the prosecution, settlement and adjustment of certain claims or causes of action against your clients Berkley Equity Limited and Anthony Lyons for action for account stated, breach of contract, negligent misrepresentation, fraudulent inducement, fraudulent misrepresentation, and civil conspiracy as asserted and prosecuted in *DRE Health Corporation v. Berkley Equity Limited and Anthony Lyons; Case No.: 4:22-cv-00031-RK; United States District Court Western District of Missouri.*

The claim of DRE exceeds \$195,000,000.00 plus applicable interest and for DRE’s costs and reasonable attorney’s fees. According to the terms of the contract of the undersigned attorneys with DRE, my law firm is to receive as compensation for its services a fee of seven percent (7%) of any gross recovery, whether by suit, compromise or otherwise, in *DRE Health Corporation v. Berkley Equity Limited and Anthony Lyons; Case No.: 4:22-cv-00031-RK; United States District Court Western District of Missouri.* Further, our firm is also entitled to recover fees and expenses and costs for certain services rendered on an hourly basis since the inception of the case, and such hourly fees and expenses and costs owed by DRE currently exceed \$200,000.00.

Sincerely,



G. Edgar “Eddie” James
James Sobba, LLC

cc: Isaac Bawany, CEO, DRE Health Corporation